

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 7  Case No. 19-12153 (KBO)  (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> ,  Plaintiff,  vs.  M.A.R.S., INC. dba MODERN AMERICAN RECYCLING SERVICES,  Defendant.	Adv. Proc. No. 21-50215 (KBO)

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER APPROVING  
SECOND STIPULATION FOR FURTHER EXTENSION OF TIME FOR DEFENDANT  
TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

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The undersigned hereby certifies as follows:

1. On March 3, 2021, George L. Miller, appointed as the chapter 7 trustee (the “Trustee”) of the Debtors’ bankruptcy estates, filed the *Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550* (the “Complaint”) with the U.S. Bankruptcy Court for the District of Delaware (the “Court”) against defendant M.A.R.S., Inc., dba Modern American Recycling Services (the “Defendant” together with Plaintiff, the “Parties”).

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

2. On April 4, 2021, the Parties entered into the *Stipulation for Extension of Time for Defendant to Answer, Move, or Otherwise Respond to the Complaint* [Adv. Docket No. 4], which extended the deadline for the Defendant to respond to the Complaint to April 30, 2021.

3. The Parties have agreed and entered into a stipulation, subject to this Court's approval, to further extend the Defendant's time to answer or respond to the Plaintiff's Complaint. Attached hereto as **Exhibit A** is a proposed form of order approving the stipulation. The stipulation is attached as Exhibit 1 to the proposed form of order.

4. Accordingly, the Parties request that this Court enter the proposed form of order.

Dated: April 29, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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